

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

)
) No. 03 MDL 1570 (RCC)
) ECF Case
)

This document relates to:

ASHTON, *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*, Case No. 02-CV-6977;
CONTINENTAL CASUALTY CO., *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*, Case No. 04-
CV-05970;
FEDERAL INSURANCE CO., *et al.* v. AL QAIDA, *et al.*, Case No. 03-CV-6978; and
NEW YORK MARINE AND GENERAL INSURANCE CO. v. AL QAIDA, *et al.*, Case No. 04-
CV-6105.

**DR. ADNAN BASHA'S
RESPONSE TO PLAINTIFFS' CONSOLIDATED COMPLAINTS**

Defendant Dr. Adnan Basha, by and through undersigned counsel, respectfully submits his response to the plaintiffs' "consolidated" complaints. Defendant's motion to dismiss the *Ashton*, *Continental Casualty*, *Federal Insurance*, and *New York Marine* complaints is fully briefed.

Subsequently, on September 30, 2005, these plaintiffs filed their "consolidated" complaints, which consisted of their complaints supplemented by a total of eighty RICO Statements and Rule 12(e) More Definite Statements. However, none of these supplemental filings has any new allegations about Dr. Basha that has not already been addressed in his motion to dismiss. Therefore, Dr. Basha requests that this Court consider his fully briefed motion to dismiss, Nos. 1195-1197 (Sept. 6, 2005) and No. 1306 (Sept. 27, 2005), as his response to the plaintiffs' "consolidated" complaints.

Respectfully submitted,

/s/ Lynne Bernabei

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DATED: October 18, 2005

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2005, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

Alan R. Kabat